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March 10, 2008

Corporation Counsel
By Fax: 212 788 9776

Attn: Hillary Fromer, Esq

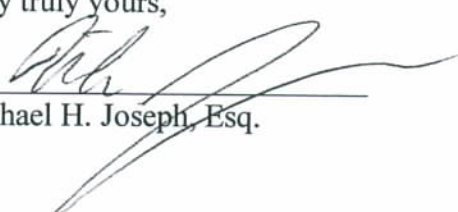
Re: Manganiello v. City of New York, Et. Al.

Dear Ms. Fromer:

Please find enclosed an email received from the Court. We again demand that all witnesses who were noticed be produced for deposition including Ms. Scaccia. If you need to make an application for an extension to produce Ms. Scaccia, we have no objection, given her trial schedule.

However, please be advised that if a summary judgment motion is made prior to all of the witnesses being produced we will cross move to strike your answer. Please be guided accordingly.

Very truly yours,



Michael H. Joseph, Esq.

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[SquirrelMail](#)[Message List](#) | [Delete](#)[Previous](#) | [Next](#)[Forward](#) | [Forward as Attachment](#) | [Reply](#) | [Reply All](#)**Subject:** Manganiello v. City of New York, et al., 07-cv-3644**From:** Anna_Gercas@nysd.uscourts.gov**Date:** Mon, March 10, 2008 4:11 pm**To:** michael@whiteplainslawyers.org ([more](#))**Priority:** Normal**Options:** [View Full Header](#) | [View Printable Version](#) | [Download this as a file](#)

Dear Counsel:

Today I relayed to Judge Baer, who is out of the office until this Friday, the contents of Mr. Joseph's letter dated March 7, 2008 in the above-referenced case. In response, Judge Baer asked me to let you know that, in light of the reasoning provided by Plaintiff's counsel in his March 7 letter, Judge Baer approves up to 15 depositions by the Plaintiff. Judge Baer will enter his endorsement when he returns on Friday, but given impending deadlines under the Pretrial Scheduling Order, wanted me to let you know immediately.

Please feel free to call or email me if you have any questions.

Best regards,
Anna Gercas

Anna Gercas, Esq.
Law Clerk to the Honorable Harold Baer Jr.
Tel: (212) 805-0184
Fax: (212) 805-7901

Date/Time: Mar. 10. 2008 6:31PM

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